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1 June 1999

Federal Aviation Administration  
Office of Chief Counsel  
Rules Docket Office (29547)  
800 Independence Avenue SW  
Room 915-G  
Washington DC 20591

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OFFICE OF THE  
CHIEF COUNSEL  
RULES DOCKET  
1999 JUN - 9 A 10:55

Dear Sir

**207 Minute Extended Range Operations with  
Two-Engine Aircraft (ETOPS) Operation Approval Criteria  
(Docket 29547)**

We would like to comment on the Air Transportation Association submission and the proposed FAA Policy Letter to allow 207 minute ETOPS on a flight-by-flight exception basis. IAPA supports the concepts of ETOPS approval and, in principle, the 15% extension to a HO-minute approval on the lines proposed. (Allowing an increased diversion time can reduce the chosen track distance and journey time, and reduce the time of exposure to risks). This, however, should only be allowed subject to the following:

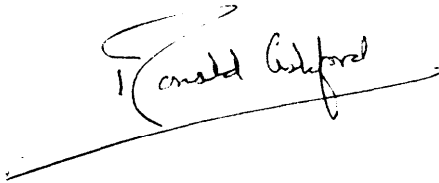
- 1) Substantial satisfactory evidence of HO-minute operations by the aircraft type in question with the relevant engine model and systems standard, as intended by ETOPS Policy Letter EPL 95-1 for extensions to 120-minute approvals.
- 2) The en-route ETOPS alternates, in addition to adequate levels of RFFS (see 3), must have adequate facilities to accommodate and properly care for the maximum number of passengers that might be expected from flights (more than one if reasonably foreseeable under extreme conditions) including:
  - (a) Appropriate aircraft steps and suitable transport to the terminal facilities.
  - (b) Sufficient warm accommodation with adequate seating.
  - (c) Provision for simple refreshments.
  - (d) Adequate toilet facilities and sanitation.
  - (e) Continued availability of medical assistance in a reasonable timescale.

- 3) It is assumed that provision of **RFFS** and supporting medical care will be required to a standard similar to that required for a destination airfield so as to cater for the possibility of a landing accident.

Without such provisions, a diversion to an **ETOPS** alternate would not be a fully satisfactory option and the aircraft commander's decision to divert could be influenced by the unsatisfactory nature of the alternate's facilities.

It would also be appropriate to initiate action to ensure that **ICAO's SARPs** and guidelines are consistent with these proposals for all destination and alternate airfields.

Yours faithfully

A handwritten signature in black ink, appearing to read "Ronald Gifford", is written over a horizontal line.

for and on behalf on **IAPA**, Government and Industry